

1 **JODI D. THORP**

2 California Bar No. 223663

3 427 "C" Street Suite 300

4 San Diego, California 92101

5 Telephone: (619) 233-3169 ext. 14

6 jodithorp@thorplawoffice.com

7
8 Counsel for Mr. Flores-Partida

9 UNITED STATES DISTRICT COURT

10 SOUTHERN DISTRICT OF CALIFORNIA

11 (HONORABLE BARRY TED MOSKOWITZ)

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ABEL FLORES-PARTIDA,

16 Defendant.

) CASE NO. 08CR1404-BTM

) DATE: August 29, 2008
) TIME: 8:45 A.M.

) MOTION FOR ORDER
) TO SHORTEN TIME

17 The above-named defendant, by and through counsel, moves this Court for an order shortening
18 time in the attached *Sentencing Memorandum* to two (2) days, to be heard August 29, 2008, at 8:45 a.m. or
19 as soon thereafter as counsel may be heard. Counsel was expecting supporting documentation from Mexico
20 that would assist with the Sentencing Memorandum. Due to difficulties receiving the documents from
21 Mexico, counsel still has not been able to retrieve the supporting documentation. However, counsel did not
22 wish to seek a continuance in this case as Mr. Flores-Partida could receive a time served sentence if this Court
23 agrees with defense counsel's recommendation.

24
25 Respectfully submitted,

26 /s/ Jodi Thorp

27 DATED: August 27, 2008

28 JODI THORP
Counsel for Mr. Flores-Partida